| 1 | ORRICK, HERRINGTON & SUTCLIFFE LLP | |
|----|--|---|
| 2 | KAREN G. JOHNSON-MCKEWAN (SBN 121 kjohnson-mckewan@orrick.com | |
| 3 | ANNETTE L. HURST (SBN 148738) ahurst@orrick.com | |
| 4 | GABRIEL M. RAMSEY (SBN 209218) | |
| | gramsey@orrick.com 405 Howard Street, San Francisco, CA 94105 | |
| 5 | Tel: 1.415.773.5700 / Fax: 1.415.773.5759 PETER A. BICKS (pro hac vice) | |
| 6 | pbicks@orrick.com LISA T. SIMPSON (<i>pro hac vice</i>) | |
| 7 | lsimpson@orrick.com 51 West 52 nd Street, New York, NY 10019 | |
| 8 | Tel: 1.212.506.5000 / Fax: 1.212.506.5151 | |
| 9 | BOIES, SCHILLER & FLEXNER LLP | |
| 10 | DAVID BOIES (pro hac vice) dboies@bsfllp.com | |
| 11 | 333 Main Street, Armonk, NY 10504 Tel: 1.914.749.8200 / Fax: 1.914.749.8300 | |
| 12 | STEVEN C. HOLTZMAN (SBN 144177) sholtzman@bsfllp.com | |
| 13 | 1999 Harrison St., Ste. 900, Oakland, CA 9461 Tel: 1.510.874.1000 / Fax: 1.510.874.1460 | 2 |
| 14 | ORACLE CORPORATION | |
| 15 | DORIAN DALEY (SBN 129049) dorian.daley@oracle.com | |
| | DEBORAH K. MILLER (SBN 95527) | |
| 16 | deborah.miller@oracle.com MATTHEW M. SARBORARIA (SBN 211600) | |
| 17 | matthew.sarboraria@oracle.com RUCHIKA AGRAWAL (SBN 246058) | |
| 18 | ruchika.agrawal@oracle.com 500 Oracle Parkway, | |
| 19 | Redwood City, CA 94065 | |
| 20 | Tel: 650.506.5200 / Fax: 650.506.7117 | |
| 21 | Attorneys for Plaintiff ORACLE AMERICA, INC. | |
| 22 | | DISTRICT COURT |
| 23 | NORTHERN DISTRICT OF CALIFORNIA | |
| 24 | | SCO DIVISION |
| | ORACLE AMERICA, INC., | Case No. CV 10-03561 WHA ADMINISTRATIVE MOTION TO FILE |
| 25 | Plaintiff, v. | UNDER SEAL PORTIONS OF ORACLE'S REPLY ISO ITS MOTION |
| 26 | GOOGLE INC., | IN LIMINE #7 RE: DR. LEONARD |
| 27 | Defendant. | Hearing: April 27, 2016, 8:00 a.m. Dept.: Courtroom 8, 19th Floor |
| 28 | | Judge: Honorable William H. Alsup |

ADMIN. MOT. TO FILE UNDER SEAL ORACLE'S REPLY ISO MIL #7 CV 10-03561 WHA

| 1 | Plaintiff Oracle America, Inc. ("Oracle") hereby moves to file portions of its Reply In | |
|--|--|--|
| 2 | Support of Its Motion in Limine #7 Regarding Dr. Leonard under seal pursuant to Civil Local | |
| 3 | Rules 7-11 and 79-5. | |
| 4 | The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in | |
| 5 | this case, ECF No. 68, states that when material has been designated as "CONFIDENTIAL" or | |
| 6 | "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY," a party may not file it in the | |
| 7 | public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Stipulated | |
| 8 | Protective Order § 14.4, ECF No. 66. | |
| 9 | Google Inc. ("Google") has designated material discussed in Oracle's Reply as | |
| 10 | "CONFIDENTIAL" and "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" pursuant | |
| 11 | to the Protective Order. Therefore, Oracle moves to seal the following portions of its Reply: | |
| 12 | | |
| 13 | Page | Text to be sealed |
| 14 | Page 2-3 | Quotation to paragraph 33 of Dr. Leonard's |
| | 1 180 2 0 | Report found at page 2, line 21 through page 3, |
| 15 | | Report found at page 2, line 21 through page 3, line 2. |
| 16 | | line 2. |
| 16 17 | Oracle states no position as to whether di | |
| 16 17 18 | | line 2. |
| 16 17 18 19 | Oracle states no position as to whether di | line 2. sclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN |
| 16 17 18 19 20 | Oracle states no position as to whether di Google or any third parties. | line 2. Seclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN ANNETTE L. HURST GABRIEL M. RAMSEY |
| 16 17 18 19 20 21 | Oracle states no position as to whether di Google or any third parties. | Inne 2. Section Section In the section of these materials would cause harm to the section of these materials would cause harm to the section of these materials would cause harm to the section of the s |
| 16 17 18 19 20 21 22 | Oracle states no position as to whether di Google or any third parties. | line 2. Sclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN ANNETTE L. HURST GABRIEL M. RAMSEY PETER A. BICKS |
| 16 17 18 19 20 21 22 23 | Oracle states no position as to whether di Google or any third parties. | Inne 2. Sclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN ANNETTE L. HURST GABRIEL M. RAMSEY PETER A. BICKS LISA T. SIMPSON Orrick, Herrington & Sutcliffe LLP |
| 16 17 18 19 20 21 22 23 24 | Oracle states no position as to whether di Google or any third parties. | Inne 2. Section Section In the section of these materials would cause harm to the section of these materials would cause harm to the section of these materials would cause harm to the section of the s |
| 16 17 18 19 20 21 22 23 24 25 | Oracle states no position as to whether di Google or any third parties. | Isclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN ANNETTE L. HURST GABRIEL M. RAMSEY PETER A. BICKS LISA T. SIMPSON Orrick, Herrington & Sutcliffe LLP By: /s/ Andrew D. Silverman Attorneys for Plaintiff |
| 16 17 18 19 20 21 22 23 24 25 26 | Oracle states no position as to whether di Google or any third parties. | Isclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN ANNETTE L. HURST GABRIEL M. RAMSEY PETER A. BICKS LISA T. SIMPSON Orrick, Herrington & Sutcliffe LLP By: /s/ Andrew D. Silverman |
| 16 17 18 19 20 21 22 23 24 25 | Oracle states no position as to whether di Google or any third parties. | Isclosure of these materials would cause harm to KAREN G. JOHNSON-MCKEWAN ANNETTE L. HURST GABRIEL M. RAMSEY PETER A. BICKS LISA T. SIMPSON Orrick, Herrington & Sutcliffe LLP By: /s/ Andrew D. Silverman Attorneys for Plaintiff |